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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, et al.,

Individual and Representative Plaintiff,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:23-cv-03417-VC (TSH)

**STIPULATED REQUEST AND [PROPOSED]
ORDER FOR IN-PERSON HEARING**

Date: August 22, 2024

Time: 10:00 AM

Place: Courtroom E – 15th Floor

Before: Hon. Thomas S. Hixson

1 Pursuant to Civ. L.R. 6-2 and 7-12, Plaintiffs Richard Kadrey, Sarah Silverman, Christopher
2 Golden, Jacqueline Woodson, Andrew Sean Greer, Rachel Louise Snyder, David Henry Hwang, Ta-
3 Nehisi Coates, Laura Lippman, Matthew Klam, Junot Díaz and Lysa TerKeurst (“Plaintiffs”); and
4 Defendant Meta Platforms, Inc. (“Defendant;” together with Plaintiffs, “Parties”) by and through their
5 respective counsel stipulate:

6 WHEREAS, on August 1, 2024, the Court set a hearing on the Joint Letter Brief filed by Meta
7 Platforms, Inc. (ECF 105, “Motion”) to occur by videoconference on August 16, 2024 (ECF 108);

8 WHEREAS, Plaintiffs believe that an in-person hearing will be useful to the Court because the
9 Motion involves a privilege dispute, one or more of the Parties may seek to reference particular
10 portions of the at-issue documents (all previously submitted to the Court) during the hearing, and doing
11 so in person may assist the Court to review the at-issue documents from the bench while avoiding
12 public disclosure of said documents;

13 WHEREAS, the Parties will not reference any documents at the hearing that have not already
14 been provided to the Court;

15 WHEREAS, separately, Joseph Saveri, lead counsel for several of the Plaintiffs, has a pre-
16 planned vacation this week and is unable to attend the August 16, 2024 hearing;

17 WHEREAS, the Parties have met and conferred, and Defendant does not oppose an in-person
18 hearing on the Motion or moving the hearing to such a date that Mr. Saveri can attend, including by
19 videoconference so long as the videoconference is non-public;

20 WHEREAS, the Parties have determined a mutually-agreeable date based on the Court’s
21 ordinary time for Civil Law & Motion hearings to re-set the Motion for an in-person hearing;

22 WHEREAS, the Parties have not previously requested any time modification in addressing this
23 matter, and the requested time modification will not affect the overall case schedule.

24 IT IS HEREBY STIPULATED AND AGREED, by and through Plaintiffs and Defendant, as
25 represented by their undersigned counsel, and subject to the approval of the Court, that the hearing on
26 the Motion previously set for August 16, 2024, by videoconference be re-set for an in-person hearing
27 on August 22, 2024 at 10:00 AM.

[PROPOSED] ORDER

The above stipulation of the Parties is hereby approved. PURSUANT TO STIPULATION, IT IS
HEREBY ORDERED that the hearing on Motion previously set for August 16, 2024, by
videoconference is re-set for an in-person hearing on August 22, 2024 at 10:00 AM.

Dated: August __, 2024

HON. THOMAS S. HIXSON
UNITED STATES MAGISTRATE JUDGE

1 Dated: August 13, 2024

Respectfully Submitted,

2 By: /s/ Joseph R. Saveri
Joseph R. Saveri

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24 *Counsel for Individual and Representative*
25 *Plaintiffs and the Proposed Class*
26
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1 Dated: August 13, 2024

By: /s/ Kathleen R. Hartnett
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Attorneys for Defendant
META PLATFORMS, INC.

E-FILING ATTESTATION

As the ECF user whose user ID and password are utilized in the filing of this document, I attest under penalty of perjury that concurrence in the filing of the document has been obtained from each of the other signatories.

Dated: August 13, 2024

Respectfully Submitted,

By: /s/ Joseph R. Saveri
Joseph R. Saveri